

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**UM 1373**

In the Matter of the Application of Portland )  
General Electric Company for an Order ) PETITION TO INTERVENE OF THE  
Approving the Deferral of Investigation and ) INDUSTRIAL CUSTOMERS OF  
Remediation Response Costs Associated with ) NORTHWEST UTILITIES  
the Portland Harbor and Harbor Oil Superfund )  
Sites Cleanup and Restoration )

Pursuant to ORS § 756.525 and OAR § 860-012-0001, the Industrial Customers of Northwest Utilities (“ICNU”) hereby petitions the Oregon Public Utility Commission (“Commission”) to intervene in this proceeding with full party status as described in OAR § 860-011-0035(5). In support of this petition, ICNU represents as follows:

1. The business address of ICNU is:  
  
Michael Early  
Industrial Customers of Northwest Utilities  
333 S.W. Taylor, Suite 400  
Portland, OR 97204
2. ICNU will be represented in this proceeding by Davison Van Cleve, P.C.

All documents relating to these proceedings should be served on ICNU’s attorneys at the following address:

S. Bradley Van Cleve  
Allen C. Chan  
Davison Van Cleve, P.C.  
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Portland, OR 97204  
E-Mail: mail@dvclaw.com  
Telephone: (503) 241-7242  
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3. ICNU is an incorporated, non-profit association of large industrial electric customers in the Pacific Northwest, with offices in Portland, Oregon. A list of ICNU members is included as Attachment A. Many members of ICNU are customers of Portland General Electric Company (“PGE”), as indicated on Attachment A.

4. ICNU has a substantial interest in the impacts of PGE’s Application for an Order Approving the Deferral of Investigation and Remediation Response Costs Associated with the Portland Harbor and Harbor Oil Superfund Sites Cleanup and Restoration. The proposed order would substantially change and directly affect those of ICNU’s members who purchase power from PGE. ICNU requests leave to intervene in this Docket to represent its members who are affected by the proposed deferral.

5. ICNU represents the interests of many of PGE’s largest customers. ICNU has participated in numerous other proceedings that affected PGE’s rates. ICNU’s intervention in this proceeding will assist the Commission in resolving the issues in this proceeding and will not unreasonably broaden the issues, burden the record, or unreasonably delay this proceeding.

6. As described above, ICNU has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. It is in the public interest to allow ICNU to intervene in this proceeding.

WHEREFORE, ICNU respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding.

Dated this 15th day of April, 2008.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ S. Bradley Van Cleve

S. Bradley Van Cleve

Allen C. Chan

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Of Attorneys for the Industrial Customers of  
Northwest Utilities

**ATTACHMENT A**  
**INDUSTRIAL CUSTOMERS OF NORTHWEST UTILITIES**

Air Liquide  
Air Products  
Ampcor PET Packaging USA, Inc.  
Certain Teed Gypsum & Ceiling Manufacturing, Inc.  
\*Blue Heron Paper Company  
\*Boeing  
\*Boise Paper  
ConAgra Foods  
Dyno Nobel, Inc.  
Eka Chemicals, Inc.  
Emerald Kalama Chemical, LLC  
Evanite Fiber  
\*Evraz Oregon Steel Mills  
Georgia-Pacific  
Grays Harbor Paper, L.P.  
Hewlett-Packard  
Inland Empire Paper Co.  
\*Intel  
\*J.R. Simplot  
Kimberly-Clark Corporation  
Longview Fibre  
Microsoft Corporation  
\*Norpac Foods  
\*PCC Structurals, Inc.  
Ponderay Newsprint Co.  
REC Silicon  
Shell Oil Products US  
Simpson Paper & Timber  
\*SP Newsprint  
Tesoro Refining and Marketing Co.  
Wah Chang  
\*West Linn Paper Company  
\*Weyerhaeuser

*\*Denotes PGE Customers*

# Davison Van Cleve PC

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April 15, 2008

*Via Electronic and U.S. Mail*

Public Utility Commission  
Attn: Filing Center  
550 Capitol St. NE #215  
P.O. Box 2148  
Salem OR 97308-2148

Re: In the Matter of the Application of Portland General Electric Company for an Order Approving the Deferral of Investigation and Remediation Response Costs Associated with the Portland Harbor and Harbor Oil Superfund Sites Cleanup and Restoration  
**Docket No. UM 1373**

Dear Filing Center:

Enclosed please find an original and one courtesy copy of the Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities in the above-referenced docket. Thank you for your attention to this matter.

Sincerely yours,

/s/ Brendan E. Levenick  
Brendan E. Levenick

Enclosures

cc: Service List

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the foregoing Petition to Intervene on behalf of the Industrial Customers of Northwest Utilities upon the parties, on the service list, by causing the same to be deposited in the U.S. Mail, postage-prepaid, where paper service is not waived.

Dated at Portland, Oregon, this 15th day of April, 2008.

/s/ Brendan E. Levenick  
Brendan E. Levenick

**OREGON PUBLIC UTILITY COMMISSION**  
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